

### **REMARKS**

Applicants have now had an opportunity to carefully consider the Examiner's comments set forth in the Office Action of March 29, 2004.

Reconsideration of the Application is requested.

#### **The Office Action**

The Examiner rejected claims 1-21 under 35 U.S.C. § 102(e) as being anticipated by United States Patent No. 6,738,155 to Rosenlund.

Claims 1-21 remain in this application. Claim 22 has been added to the application.

#### **The Claims are Patentably Distinguished Over the Cited Reference.**

The Examiner rejected all claims as being anticipated by Rosenlund. However, Rosenlund discloses a system and method of providing publishing and printing services via a communications network, a system which uses a central service facility, comprising a server, a hierarchical storage management (HSM) system, a digital content management (DCM) system, a network access device (NAD), a local network, and firewall. (See col. 5, lines 41-50). More specifically, the HSM system provides low level access, archiving, and allocation to multiple tiers of storage devices, including redundant arrays of inexpensive disks (RAID) (see col. 6, lines 4-9), while the DCM system includes a computer server running software which manages the digital files communicated to and from the local network. The DCM system is used to provide content management operations such as cataloging and importing assets or files into the DCM database, tracking asset attributes, and providing user access control. (see col. 6, lines 27-54). A client or end-user provides digital files for scanning to the central service facility, which stores high resolution image files on the server and generates low resolution image files. All of these files are logged into the DCM system/database. An end-user then communicates with the DCM system in order to search its database and use its image files to produce an image file. The end-user prints the file to a spooler on the central server and the server swaps out low resolution files for high resolution files and generates a PDF file. (See figure 6 and col. 10, line 63 – col. 11, line 44).

A key feature of the above-mentioned systems is their centralized location. In other words, the locations of the servers and associated file paths are known

entities. Specifically, the DCM system logs in the high resolution files at the beginning. Then, when an open prepress interface (OPI) process is resolved to replace low resolution with high resolution images (as described at col. 13, lines 8-26), the DCM system knows exactly where the files are located. Indeed, links are established from the low resolution images to the corresponding high resolution files on the HSM system. (See col. 7, lines 43-45). The system thus does not need to find the correct locations/path(s) for the inserted files or to be concerned with mapping pathnames for paths that are not recognized by a certain server because all of the server functions are centralized.

In contrast, one embodiment of the disclosure concerns the situation where the OPI package used to retrieve the low and high resolution data is not the same as the one used to store the data, i.e. where there is no centralized system tracking data. A development is thus being able to reliably locate the high and low resolution image data using an OPI package that was not used to store the data. Claim 1 has been amended to clarify this development. More specifically, amended claim 1 is directed at a method for determining a location of an image referenced within a stream of document data of a first system. A comment is located in the data stream, and the location of the image, which has been stored using a second system different from the first, is determined as a function of the comment. This feature, as disclosed and claimed, is not present in the centralized storage and tracking system of Roselund. As such, amended claim 1 is patentably distinct from Roselund, and should be allowed. Moreover, since claims 2-9 depend on amended claim 1, they should also be allowed.

Similarly, claim 16 shows a processor in which either a mapping or a search path is used along with a comment to identify a storage location. Mapping is used in the case where paths are specified to a storage location but the paths, as specified, are not recognized by the server. Search paths are specified general locations where the processor will search for files. Again, these features are not shown in the centralized storage system of Roselund, nor are they necessary because the DSM and HSM systems know the exact location of all the files in the system. Therefore, claim 16 is patentably distinct from Roselund and should be allowed. Since claims 17-21 depend on claim 16, claims 17-21 should also be allowed.

New dependent claim 22 has been added to clarify the situation where the images are stored on one processing network, but are retrieved from a second,

different processing network.

In addressing claim 10, it is suggested that the hierarchical storage management (HSM) system meets the limitation of prescanning the publication data for verifying the potential pathname. However, the HSM system, as a hierarchical system already containing a table (i.e. the HFD – see col. 14, lines 37-40) of known locations of files, has no need to prescan a potential pathname to verify that it is correct. The HSM system already knows the pathname is correct. Therefore, the HSM system provides no prescanning or verification of potential pathnames.

In contrast, claim 10 includes the limitation of prescanning the publication data for verifying the potential pathname. This feature, as described and claimed, is not present in Roselund. As such, claim 10 is patentably distinct from Roselund, and should be allowed. Moreover, since claims 11-15 depend on claim 10, claims 11-15 are also in condition for allowance.

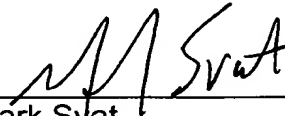
**CONCLUSION**

For the reasons detailed above, it is submitted all claims remaining in the application (Claims 1-22) are now in condition for allowance. The foregoing comments do not require unnecessary additional search or examination.

In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to call Mark Svat, at Telephone Number (216) 861-5582.

Respectfully submitted,

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